



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

BWB:DKK

*271 Cadman Plaza East  
Brooklyn, New York 11201*

July 7, 2015

By Email and ECF

Mitchell Alan Golub, Esq.  
Golub & Golub LLP  
225 Broadway  
Suite 1515  
New York, NY 10007

Re: Jane Doe v. United States  
Civil Docket No. 15-MC-1174 (JG)

Dear Mr. Golub:

On June 23, 2015, you filed a Motion to Expunge a criminal conviction on behalf of your client (the "Petitioner") in the above-captioned case. That motion asserts, among other things, that "[i]n the years since her conviction, the Petitioner has repeatedly obtained employment only to later lose it upon having the employer do the background check" and that "the Petitioner has been discharged a half dozen times in just the last two years" because of her prior conviction. (See Decl. ¶ 6, Dkt. No. 1). The government's response is due on August 28, 2015. (See July 6, 2015 Order).

I write to request that you immediately provide the government with any records within the possession, custody, or control of the Petitioner that relate to any employment the Petitioner has allegedly "lost" as a result of her criminal conviction, including but not limited to records related to her "discharge[] a half dozen times in just the last two years." In addition, I request that you produce the Petitioner for a deposition to address the Petitioner's assertions regarding her employment. See Fed. R. Civ. P. 30. The government will work to schedule that deposition at a mutually convenient time before August 28, 2015.

Please let me know as soon as possible if you object to these requests. In addition, if you have any questions, please do not hesitate to contact me.

Very truly yours,

KELLY T. CURRIE  
Acting United States Attorney

By: /s/ David K. Kessler  
David K. Kessler  
Assistant U.S. Attorney  
(718) 254-7202

cc: Clerk of the Court (JG) (by ECF)